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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAMUEL J. WEBSTER,

Defendant.

INDICTMENT

Violations: 18 U.S.C. § 48
(Animal Crushing)

Case: 1:22-cr-00068
Assigned To : Sam, David
Assign. Date : 6/1/2022

The Grand Jury Charges:

GENERAL ALLEGATIONS

1. In or about October 2021, SAMUEL J. WEBSTER ("WEBSTER") was an 18-year-old resident of Woods Cross, Utah.
2. On or about October 16, 2021, WEBSTER purchased one male guinea pig from a pet supply store in Farmington, Utah, for the purpose of creating and distributing videos depicting him torturing them. The pet supply store obtained the guinea pig from California.

3. On or about October 23, 2021, WEBSTER purchased one female guinea pig from a pet supply store in Salt Lake City, Utah, for the purpose of creating and distributing videos depicting him torturing them. The pet supply store obtained the guinea pig from California.

4. On or about October 25, 2021, WEBSTER purchased one male and one female guinea pig from a pet supply store in West Jordan, Utah, for the purpose of creating and distributing videos depicting him torturing them. The pet supply store obtained the guinea pig from California.

5. In or about October of 2021, WEBSTER tortured the guinea pigs that he purchased from the pet supply stores in Farmington, Salt Lake City, and West Jordan, Utah, in the course of making videos to post on YouTube.

6. WEBSTER named his YouTube accounts "Dr. T" and "Dr. T.666."

7. Between in or about October of 2021, WEBSTER posted to YouTube the following videos depicting him torturing the guinea pigs that he purchased from the pet supply stores (the "#" is solely assigned to differentiate the videos from one another):

#	Length (min:sec)	Activity Depicted in the Video	Title of the Video
1	0:21	Grabbing a guinea pig by the back of the neck, inducing it to squeal	"Guinea Pig Torture"
2	1:12	Breaking a guinea pig's limbs	"Torture is fun."
3	0:21	Physically squeezing a guinea pig	"Kinky!"
4	0:16	Ripping an ear of a guinea pig	"Ripped a piece of her ear"
5	0:20	Digitally penetrating a guinea pig	"FINGERING DA PUSSY"
6	0:14	Hitting a guinea pig	"Spanking"
7	0:06	Hitting a guinea pig	"more spanks"

8	0:14	Webster giving a thumbs-up to eviscerated remains of a guinea pig in a bucket	"Fatality"
9	1:53	Digitally penetrating a guinea pig	"More pussy"
10	0:16	Dangling and hitting a guinea pig	"K.O."
11	2:37	Hitting, digitally penetrating, and penetrating with an allen wrench	"Porn"
12	0:57	Ripping out the eye of a guinea pig with a pair of pliers	"ripped eye out"
13	0:43	Slitting a guinea pig's throat is with a knife	"Shut up stupid domestic pig!"
14	0:42	Using a pair of pliers to rip out a piece of a guinea pig's tongue	"Ripped a piece of tongue"
15	0:37	Breaking one back limb of a guinea pig	"CRACK"
16	0:37	Breaking the other back limb of a guinea pig	"Crack"
17	2:12	Ripping out a guinea pig's fur	"Torture is addicting"
18	2:37	Using a knife to cut from the genitals up through the body of a guinea pig and then placing on Webster's fingers like a puppet	"I tried to make a puppet out of a guinea pig"

8. WEBSTER posted on YouTube, the following comments about the above listed videos:

- "killing and torture is my favorite activity"
- "don't worry! I'll find you eventually!"
- "somebody help me before I kill everyone else"
- "Well you'll be really excited when I show up by your door step"
- "I have a bunch of people already on my list, but I guess I can add you too"
- "You don't understand my satisfaction....Torture is like a drug to me, it's very addicting. Hearing the scream of pain is so satisfying. We are

disguised as lambs and yet we all have a tiger inside us. Predators kill there prey mostly by using torture, because it is easier to catch their prey. So I don't just throw these pathetic domestic pigs in the trash lol. I eat guinea pig meat daily, it's amazing! I also cut their heads off to make dolls out of them. I really urge you to try it for yourself."

- "Lol u can't delete a comment like that ðŸ˜€. I'll be at your house in a week"

COUNT I

(Distribution of Animal Crush Video)

9. Paragraphs One through Eight are realleged herein.

10. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #1, depicting him grabbing a guinea pig by the back of the neck to induce it to squeal, and subjecting it to serious bodily injury, and titled the video "Guinea Pig Torture."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT II

(Distribution of Animal Crush Video)

11. Paragraphs One through Eight are realleged herein.

12. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #2, depicting him breaking a guinea pig's limbs, and subjecting it to serious bodily injury, and titled the video "Torture is fun."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT III

(Distribution of Animal Crush Video)

13. Paragraphs One through Eight are realleged herein.

14. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #3, depicting him physically squeezing the guinea pig, and subjecting it to serious bodily injury, and titled the video "Kinky!"

All in violation of 18 U.S.C. § 48(a)(3).

COUNT IV

(Distribution of Animal Crush Video)

15. Paragraphs One through Eight are realleged herein.

16. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an

animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #4, depicting him using a pair of pliers to rip the ear of a guinea pig, and subjecting it to serious bodily injury, and titled the video “Ripped a piece of ear.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT V

(Distribution of Animal Crush Video)

17. Paragraphs One through Eight are realleged herein.

18. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #5, depicting him digitally penetrating a guinea pig, and subjecting it to serious bodily injury, and titled the video “FINGERING DA PUSSY.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT VI

(Distribution of Animal Crush Video)

19. Paragraphs One through Eight are realleged herein.

20. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video

identified above as Video #6, depicting him hitting the guinea pig, and subjecting it to serious bodily injury, and titled the video "Spanking."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT VII

(Distribution of Animal Crush Video)

21. Paragraphs One through Eight are realleged herein.

22. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #7, depicting him hitting the guinea pig, and subjecting it to serious bodily injury, and titled the video "more spansks."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT VIII

(Distribution of Animal Crush Video)

23. Paragraphs One through Eight are realleged herein.

24. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #8, depicting eviscerated remains of a guinea pig in a bucket

and WEBSTER giving a thumbs-up, and subjecting it to serious bodily injury, and titled the video “Fatality.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT IX

(Distribution of Animal Crush Video)

25. Paragraphs One through Eight are realleged herein.

26. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #9, depicting him digitally penetrating the guinea pig, and subjecting it to serious bodily injury, and titled the video “More pussy.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT X

(Distribution of Animal Crush Video)

27. Paragraphs One through Eight are realleged herein.

28. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #10, depicting him dangling and hitting the guinea pig, and subjecting it to serious bodily injury, and titled the video “K.O.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XI

(Distribution of Animal Crush Video)

29. Paragraphs One through Eight are realleged herein.

30. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #11, depicting him hitting, sexually coercing, digitally penetrating, and penetrating the guinea pig with an allen wrench, and subjecting it to serious bodily injury, and titled the video “Porn.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XII

(Distribution of Animal Crush Video)

31. Paragraphs One through Eight are realleged herein.

32. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #12, depicting him ripping out the guinea pig’s eye with a pair of pliers, and subjecting it to serious bodily injury, and titled the video “ripped eye out.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XIII

(Distribution of Animal Crush Video)

33. Paragraphs One through Eight are realleged herein.

34. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #13, depicting him slitting the guinea pig's throat with a knife, and subjecting it to serious bodily injury, and titled the video "Shut up stupid domestic pig!"

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XIV

(Distribution of Animal Crush Video)

35. Paragraphs One through Eight are realleged herein.

36. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #14, depicting him using a pair of pliers to rip out a piece of the guinea pig's tongue, and subjecting it to serious bodily injury, and titled the video "Ripped a piece of tongue."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XV

(Distribution of Animal Crush Video)

37. Paragraphs One through Eight are realleged herein.

38. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #15, depicting him breaking one back limb of a guinea pig, and subjecting it to serious bodily injury, and titled the video “CRACK.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XVI

(Distribution of Animal Crush Video)

1. Paragraphs One through Eight are realleged herein.

2. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #16, depicting him breaking the other back limb of a guinea pig, and subjecting it to serious bodily injury, and titled the video “Crack.”

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XVII

(Distribution of Animal Crush Video)

3. Paragraphs One through Eight are realleged herein.

4. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #17, depicting him ripping out a guinea pig's fur, and subjecting it to serious bodily injury, and titled the video "Torture is addicting."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XVIII

(Distribution of Animal Crush Video)

5. Paragraphs One through Eight are realleged herein.

6. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in 18 U.S.C. § 48(f)(2), in and using a means or facility of interstate and foreign commerce. Specifically, WEBSTER posted on YouTube the video identified above as Video #18, depicting him using a knife to cut from the genitals up through the body of a guinea pig and then placing the guinea pig on his fingers like a puppet, and subjecting it to serious bodily injury, and titled the video "I tried to make a puppet out of a guinea pig."

All in violation of 18 U.S.C. § 48(a)(3).

COUNT XIX

(Creation of Animal Crush Videos)

7. Paragraphs One through Eight are realleged herein.

8. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did knowingly and unlawfully create animal crush video, as defined in 18 U.S.C. § 48(f)(2), intending and having reason to know that such videos would be distributed in and using a facility of interstate and foreign commerce. Specifically, for the purpose of distributing videos on YouTube, WEBSTER created the videos identified above as Videos #1-18, depicting him breaking limbs of the guinea pigs, ripping out body parts of the guinea pigs, sexually penetrating the guinea pigs, hitting and cutting the guinea pigs, and subjecting them to serious bodily injury.

All in violation of 18 U.S.C. § 48(a)(2).

COUNT XX

(Animal Crushing)

9. Paragraphs One through Eight are realleged herein.

39. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did purposely and unlawfully engage in animal crushing, in and affecting interstate or foreign commerce. Specifically, on or about October 16, 2021, WEBSTER purchased one male guinea pig from a pet supply store in Farmington, Utah. Webster purposely subjected it to serious bodily injury, and it was obtained in interstate commerce for the purpose of creating and distributing around the world through the Internet videos of his torturing and killing it as depicted in the videos identified above.

All in violation of 18 U.S.C. § 48(a)(1).

COUNT XXI
(Animal Crushing)

10. Paragraphs One through Eight are realleged herein.

40. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did purposely and unlawfully engage in animal crushing, in and affecting interstate or foreign commerce. Specifically, on or about October 23, 2021, WEBSTER purchased one female guinea pig from a pet supply store in Salt Lake City, Utah. Webster purposely subjected it to serious bodily injury, and it was obtained in interstate commerce for the purpose of creating and distributing around the world through the Internet videos of his torturing and killing it as depicted in the videos identified above.

All in violation of 18 U.S.C. § 48(a)(1).

COUNT XXII
(Animal Crushing)

11. Paragraphs One through Eight are realleged herein.

41. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did purposely and unlawfully engage in animal crushing, in and affecting interstate or foreign commerce. Specifically, on or about October 25, 2021, WEBSTER purchased one male guinea pig from a pet supply store in West Jordan, Utah. Webster purposely subjected it to serious bodily injury, and it was obtained in interstate commerce for the purpose of creating and distributing around the world through the Internet videos of his torturing and killing it as depicted in the videos identified above.

All in violation of 18 U.S.C. § 48(a)(1).

COUNT XXIII
(Animal Crushing)

12. Paragraphs One through Eight are realleged herein.

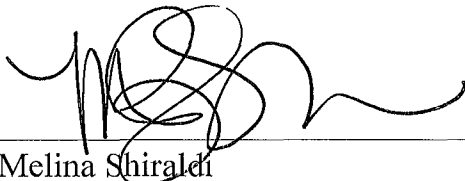
42. In or about October 2021, in the District of Utah and elsewhere, the defendant, WEBSTER, did purposely and unlawfully engage in animal crushing, in and affecting interstate or foreign commerce. Specifically, on or about October 25, 2021, WEBSTER purchased one female guinea pig from a pet supply store in West Jordan, Utah. Webster purposely subjected it to serious bodily injury, and it was obtained in interstate commerce for the purpose of creating and distributing around the world through the Internet videos of his torturing and killing it as depicted in the videos identified above.

All in violation of 18 U.S.C. § 48(a)(1).

A TRUE BILL:

/s/ _____
FOREPERSON OF GRAND JURY

TRINA A. HIGGINS
United States Attorney



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Karin M. Fojtik
Assistant United States Attorneys